

Michael Jones

From: Jenny Vega <Jenny@tedlyon.com>
Sent: Tuesday, July 18, 2017 5:34 PM
To: Michael Jones
Cc: jason.schuette@dallascityhall.com; Charles Bennett; lawyerdonhigh@gmail.com
Subject: RE: Luster v. City of Dallas et al - 30(b)(6) and Mr. Davis deposition

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Mr. Jones,

We would like to take the deposition of the corporate representative for Pilot Travel Center and of Mr. Brandon Davis. At your earliest convenience please provide me with their availability to be deposed. Below you will find the topics for Pilot Travel Centers corporate representatives deposition. Please do not hesitate to contact me with any questions:

"Pilot Travel Centers" means the defendant in the present lawsuit, Pilot Travel Centers, LLC.

"Incident" means the shooting incident the basis of this lawsuit that occurred on or near the Pilot Travel Centers property located at 7425 Bonnie View Rd, Dallas, TX 75241 on or about February 9, 2015.

"South Dallas Flying J" means the Pilot Travel Centers property where the Incident occurred located at or near 7425 Bonnie View Rd, Dallas, TX 75241.

"Loss Prevention" or "Shrinkage Prevention" means preventing customers or potential customers from taking items from a Pilot Travel Centers without paying for the items.

"Beggars" means any individual begging for money or loitering on or near the South Dallas Flying J.

1. Pilot Travel Centers' policies and procedures for hiring security officers for employment at the South Dallas Flying J.
2. Pilot Travel Centers' policies and procedures for training security officers for employment at the South Dallas Flying J.
3. Pilot Travel Centers' policies and procedures for supervising security officers during their employment at the South Dallas Flying J.
4. Pilot Travel Centers' policies and procedures for investigating incidents involving security officers while the security officers are working at South Dallas Flying J.
5. Pilot Travel Centers' policies and procedures for scheduling security officers for work at the South Dallas Flying J.
6. Pilot Travel Centers' policies and procedures for reprimanding security officers who work at the South Dallas Flying J.
7. Pilot Travel Centers policies and procedures for firing security officers who work at the South Dallas Flying J.
8. Pilot Travel Centers' policies and procedures for security officers who work at the South Dallas Flying J using deadly force.
9. Pilot Travel Centers' policies and procedures for security officers who work at the South Dallas Flying J responding to reports of incidents on the South Dallas Flying J property.
10. Pilot Travel Centers' policies and procedures for security officers who work at the South Dallas Flying J responding to incidents off the South Dallas Flying J property.

11. Pilot Travel Centers' policies and procedures for providing security officers who work at the South Dallas Flying J with their responsibilities while working security at Pilot Travel Centers.
12. Pilot Travel Centers' policies and procedures for security officers who work at the South Dallas Flying J performing their duties.
13. Pilot Travel Centers' policies and procedures for security officers who work at the South Dallas Flying J using deadly force while on duty.
14. Pilot Travel Centers' policies and procedures for security officers who work at the South Dallas Flying J performing duties related to Loss Prevention or Shrinkage Prevention.
15. Pilot Travel Centers' policies and procedures for security officers who work at the South Dallas Flying J encountering Beggars.
16. Pilot Travel Centers' policies and procedures for security officers who work at the South Dallas Flying J patrolling off Dallas Flying J property.
17. The facts and circumstances of the Incident
18. Any investigation into the Incident conducted by Pilot Travel Centers following the Incident.
19. Any investigation following an incident involving Mr. Tolerton and another individual on or about November 14, 2014 that resulted in Mr. Tolerton being taken to the hospital and not working for Pilot Travel Centers for approximately 2 weeks.
20. Any investigation following an incident involving Mr. Tolerton and Ronnie Williams that occurred on or about August 2, 2012.
21. Any other incidents involving Mr. Tolerton during his employment with Pilot Travel Centers.

Thank you,
Jenny Vega
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